### Case 20-10012-TPA Doc 74 Filed 08/21/20 Entered 08/21/20 10:31:40 Desc Main

# IN THE UNITED 19 FAITES BANGER UPT BY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: : CASE NO. 20-10012-TPA

:

David M. Vasconi II and, : CHAPTER 13

Lori Anne Vasconi,

Debtors,

\_\_\_\_\_: MOTION NO.: WO - 1

David M. Vasconi II,

Movant, : RELATED TO DOCKET NO.: 72

vs.

.

Renick Brothers,

.

and

:

Ronda J. Winnecour, Esquire,

Chapter 13 Trustee. Respondents.

:

Social Security No. xxx-xx- 2580 :

## MOTICE OF HEARING WITH RESPONSE DEADLINE ON MOTION TO TERMINATE WAGE ATTACHMENT

#### TO THE RESPONDENTS:

You are hereby notified that the above Movants seeks an Order affecting your rights or property.

You are further notified to file with the Clerk and serve upon the undersigned attorney for Movant's response to the motion no later than **September 7, 2020** i.e., seventeen (17) days after the date of service below, in accordance with the Federal Rules of Bankruptcy Procedure, Local Rules and Procedures of this Court, and the procedures of the Presiding Judge as found on the Judge's web page at <a href="https://www.pawb.uscourts.gov">www.pawb.uscourts.gov</a>. If you fail to timely respond, the Motion may be granted by the Court by default without a hearing.

#### You should take this to your lawyer at once.

A hearing will be held <u>September 16, 2020 at 10:00 am</u> before Judge Thomas P. Agresti, via the ZOOM Video Conference Application. To access the hearing, please use the following Zoom Meeting link: https://www.zoomgov.com/j/16021303488, or alternatively, to attend and use the following Meeting ID: 160 2130 3488.

To join the Zoom hearing please initiate and use the link 15 minutes prior to your scheduled hearing time. All attorneys and Parties may only appear via the Zoom Video Conference Application and must comply with the Amended Notice of Temporary Modification of Appearance Procedures Before Judge Thomas P. Agresti, as updated on June 10, 2020.

Only a limited time of 10 minutes is being provided on the calendar. No witnesses will be heard. If there is an issue of fact, an evidentiary hearing will be scheduled at a later date by the Court. An order granting the relief sought may be entered and the hearing may not be held if you do not timely file and serve a written response.

Date: August 21, 2020

Respectfully submitted,
/s/ Daniel P. Foster, Esquire
Daniel P. Foster
PA I.D. # 92376
Foster Law Offices
1210 Park Avenue
Meadville, PA 16335

Phone: 814.724.1165 Fax: 814.724.1158

Email:dan@mrdebtbuster.com

**Attorney for Debtors** 

#### **CERTIFICATE OF SERVICE**

I, the undersigned Paralegal of Foster Law Offices, certify under penalty of perjury that I am more than 18 years of age, and that I served a true and correct copy of the Motion to Terminate Wage Attachment and Notice of Hearing by First-Class Mail, U.S. Postage Paid on the parties below\*.

Executed on: <u>August 21, 2020</u> <u>by: /s/ Kaitlyn E. Vale</u>

Kaitlyn E. Vale, PARALEGAL FOSTER LAW OFFICES 1210 Park Avenue Meadville, PA 16335 Tel 814.724.1165 Fax 814.724.1158

# Case 20-10012-TPA Doc 74 Filed 08/21/20 Entered 08/21/20 10:31:40 Desc Main Document Page 4 of 5

Label Matrix for local noticing 0315-1 Case 20-10012-TPA WESTERN DISTRICT OF PENNSYLVANIA Erie Fri Aug 21 10:19:27 EDT 2020

Jerome B. Blank
Phelan Hallinan Diamond & Jones, LLP
Omni William Penn Office Tower
555 Grant Street, Suite 300
Pittsburgh, PA 15219-4408

Capital One Bank Usa NA PO Box 30281 Salt Lake City, UT 84130-0281

Comenity Bank / Brylane Home Po Box 182789 Columbus, OH 43218-2789

(p)DISCOVER FINANCIAL SERVICES LLC PO BOX 3025 NEW ALBANY OH 43054-3025

First National Bank Of Pa 4140 East State Street Hermitage, PA 16148-3401

Daniel P. Foster Foster Law Offices 1210 Park Avenue Meadville, PA 16335-3110

Huntington National Bank Po Box 1558 Columbus, OH 43216-1558

Kubota Credit Corporation Po Box 2046 Grapevine, TX 76099-2046

Garry Alan Masterson c/o Weltman, Weinberg & Reis 965 Keynote Circle Brooklyn Hts., OH 44131-1829 American Express National Bank c/o Becket and Lee LLP PO Box 3001 Malvern PA 19355-0701

Capital One / Cabelas 4800 Nw 1st Street Lincoln, NE 68521-4463

(p) CHEMUNG CANAL TRUST COMPANY ATTN RESOURCE RECOVERY PO BOX 1522 ELMIRA NY 14902-1522

Comenity Capital Bank / Boscov Po Box 182120 Columbus, OH 43218-2120

Dsnb Macys Po Box 8218 Mason, OH 45040-8218

Ford Motor Credit Company PO Box 542000 Omaha, NE 68154-8000

Freedom Mortgage Corporation 907 Pleasant Valley Avenue Mount Laurel, NJ 08054-1210

(p) JEFFERSON CAPITAL SYSTEMS LLC PO BOX 7999 SAINT CLOUD MN 56302-7999

Lending Club Corporation 595 Market Street San Francisco, CA 94105-2807

Office of the United States Trustee Liberty Center. 1001 Liberty Avenue, Suite 970 Pittsburgh, PA 15222-3721 Amex PO Box 981537 El Paso, TX 79998-1537

Capital One Bank (USA), N.A. by American InfoSource as agent PO Box 71083 Charlotte, NC 28272-1083

Citibank, N.A. 5800 S Corporate Pl Sioux Falls, SD 57108-5027

Discover Bank
Discover Products Inc
PO Box 3025
New Albany, OH 43054-3025

FREEDOM MORTGAGE CORPORATION Bankruptcy Department, 10500 KINCAID DRIVE FISHERS IN 46037-9764

(p) FORD MOTOR CREDIT COMPANY P O BOX 62180 COLORADO SPRINGS CO 80962-2180

Huntington National Bank 41 South High Street Columbus, OH 43287-0001

Rubota Credit Corporation PO Box 9013 Addison, Texas 75001-9013

Lightstream 303 Peachtree Street Northeast Atlanta, GA 30308-3201

PRA Receivables Management, LLC PO Box 41021 Norfolk, VA 23541-1021

## Case 20-10012-TPA Doc 74 Filed 08/21/20 Entered 08/21/20 10:31:40 Desc Main Document Page 5 of 5

Pennsylvania Department of Revenue Bankruptcy Division P.O. Box 280946 Harrisburg, PA 17128-0946

Department 280946 P.O. Box 280946 ATTN: BANKRUPTCY DIVISION Harrisburg, PA 17128-0946

Pennsylvania Dept. of Revenue

Po Box 3180 Pittsburgh, PA 15230-3180

Pnc Bank

(p) PORTFOLIO RECOVERY ASSOCIATES LLC PO BOX 41067 NORFOLK VA 23541-1067 Quantum3 Group LLC as agent for Comenity Capital Bank PO Box 788 Kirkland, WA 98083-0788 Thomas Song
Phelan Hallinan Diamond & Jones, LLP
1617 JFK Boulevard
Suite 1400
Philadelphia, PA 19103-1814

SunTrust Bank now Truist Bank Attn: Support Services P.O. Box 85092 Richmond, VA 23286-0001 Suntrust 600 West Broadway Suite 2000 San Diego, CA 92101-3358 Syncb / Amazon Po Box 965015 Orlando, FL 32896-5015

Syncb / Care Credit Po Box 965036 Orlando, FL 32896-5036 Syncb / Nautilus Po Box 965036 Orlando, FL 32896-5036 Syncb / Sleep Number Po Box 965036 Orlando, FL 32896-5036

Synchrony Bank c/o of PRA Receivables Management, LLC PO Box 41021 Norfolk, VA 23541-1021 TD Bank USA, N.A. C/O WEINSTEIN & RILEY, PS 2001 WESTERN AVENUE, STE 400 SEATTLE, WA 98121-3132 THE HUNTINGTON NATIONAL BANK PO BOX 889424 CLEVELAND, OH 44101-8539

Td Bank Usa / Target Credit Po Box 673 Minneapolis, MN 55440-0673 The Home Depot / Cbna Po Box 6497 Sioux Falls, SD 57117-6497 David M. Vasconi II 98 Airport Road Mercer, PA 16137-5102

Lori Anne Vasconi 98 Airport Road Mercer, PA 16137-5102

by American InfoSource as agent PO Box 4457 Houston, TX 77210-4457 James Warmbrodt KML Law Group, P.C. 701 Market Street Suite 5000 Philadelphia, PA 19106-1541

Wells Fargo Bank N.A., d/b/a Wells Fargo Aut PO Box 130000 Raleigh, NC 27605 Wells Fargo Bank Na Po Box 14517 Des Moines, IA 50306-3517 Wells Fargo Bank, N.A. Wells Fargo Card Services PO Box 10438, MAC F8235-02F Des Moines, IA 50306-0438

Wells Fargo Dealer Service Po Box 10709 Raleigh, NC 27605-0709 West Penn P & P Federal Credit Union 1089 Third Street Beaver, PA 15009-2034 Ronda J. Winnecour Suite 3250, USX Tower 600 Grant Street Pittsburgh, PA 15219-2702

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).